



CALIFORNIA FARM BUREAU FEDERATION

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California Farm Bureau Federation Comments on RETI Phase 2A Draft Report July 8, 2009

TO: RETI Stakeholder Steering Committee:

The California Farm Bureau Federation ("Farm Bureau") appreciates the opportunity to comment on the Phase 2A Draft Report ("Report") dated June 2009. As with the other documents produced from the RETI process, the Report can be a useful tool to help policymakers, stakeholders and the public assess the impacts of implementing RPS targets and the attendant infrastructure. It is clear from the many caveats that are interspersed throughout the Report that the conclusions reached about CREZs and transmission segments are just stepping stones to help indicate areas for further inquiry. To inform where further areas of inquiry are required or where information may have misapplied, every effort needs to be made to clearly delineate details underlying the conclusions reached in the Report. Farm Bureau's comments on specific provisions of the Report and suggestions for change are set forth below by section:

CREZ Revision

- It was an important step to recognize that simply because land is the theoretically appropriate for renewable generation use as identified through the CREZ process, it may not be feasible to develop it. As further review is conducted of the CREZs, other impediments in addition to ownership fragmentation will likely arise.
- The limitations identified with the analysis of out of state resources (Page 2-30) are further examples that the Report can be a tool but not a conclusion about the areas that offer the most value and highest priority to connect with transmission. Because there are so many uncertainties about those resources' viability, the transmission segments to access them, such as the North Group require extensive scrutiny.

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Conceptual Transmission Planning (Page 3-36)

- Minimizing impacts from new rights of way is an appropriate planning criteria in a large number of instances, but every rule has an exception. At some point, co-location can become burdensome and render otherwise useful resources valueless, because the multitude of towers can affect significant portions of discrete parcels. Language should be added to this first section as follows:

"...adjacent to existing ROW, recognizing that at some point the affected land can become saturated with transmission ROW. The ability of land to sustain multiple ROWs will depend on the type and use of land."

- As next steps are pursued, as identified in this section, and more specific recommendations made RETI should not lose sight of its self-identified limitations. (Page 3-38)

Limitations of the RETI Rating Methodology

- Almost as important as being clear about what RETI accomplished between Phase 1B and 2A, is the level of specificity as to what it does not do. The details about the qualifications expressed here assist in better informing the advantages/disadvantages of the information that has been collected. (Page 3-47)
- A threshold qualification identified in this section should be brought forward to the Executive Summary. (Page 3-48) The following qualification is important and warrants greater visibility:

"It is crucial to keep in mind that this initial conceptual plan is intended primarily to identify priority lines for detailed power flow study and production cost modeling."

It is difficult, of course, to determine which provisions to include in the Executive Summary, but the language above conveys exceptionally well that this plan is a first step only and studies outside the RETI process are required in order to assess the value and ultimate viability for the lines.

Evaluation of Line Segment Environmental Concerns

- This portion of RETI's evaluation is clearly important to Farm Bureau, as agricultural resources are properly part of any environmental analysis.

- Agricultural resources in California are mapped and defined by a combination of attributes through the California Department of Conservation by these categories: prime farmland, farmland of statewide importance, unique farmland, farmland of local importance and grazing land. When assessing agricultural resources these categories are used for guiding discussions in a variety of circumstances such as CEQA analysis.
- As shown in the chart at Figure 3-7, evaluation of impacts to agricultural resources from transmission segments did not use the foregoing categories, but instead assessed only lands subject to Williamson Act contracts. Because Williamson Act agricultural lands are held pursuant to the voluntary agreement between an agricultural landowner and the affected county, the agricultural land in the categories identified above will not necessarily be reflected in the Williamson Act lands assessed in this evaluation. Williamson Act lands, although an important part of analyzing resources, are only a subset of the productive agricultural resources in California giving rise to environmental concerns and requiring mitigation. Even use of the Williamson Act designation may have been incomplete. It appears from the map used that there were gaps in the mapping information for some counties' Williamson Act designations. That lack of information coupled with comments during the course of the working group indicating a low regard for reviewing impacts to agricultural land, raise questions about the efficacy of the review.
- Assessment by agricultural land category, provides a more complete approach to evaluation for agricultural resources and more consistent with recognized environmental evaluations. The categories identified above are what should have been used for the analysis that was conducted. In the interim, for this Phase 2A Report, acknowledgment should be made that the categorization of agricultural resources is incomplete as compared with other methodologies conducted for environmental analyses.
- As a result of the limited approach used, the assessment of the agricultural resources may provide a very limited depiction of the likely concerns that will be raised by many of the transmission segments reviewed. As the evaluation moves forward, RETI would benefit from the expertise available from the California Department of Conservation (which maps the lands), whose assistance was offered but not used in the Phase 2A process. It should be noted that there were no experts in the panel that reviewed the segments, who have statewide information about agricultural resources as readily available as the Department of Conservation.
- If the major goal of RETI conceptual planning process is indeed "to anticipate environmental concerns" all of the agricultural resources in the

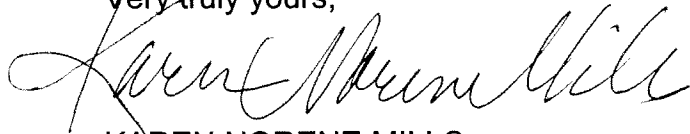
state need to be reviewed, not just a subset of them. Because all of the listed categories of agricultural lands are mapped by the Department of Conservation, it will be no more difficult to include an analysis based on the various categories of lands and not just Williamson Act lands.

Policy Recommendations

- Consideration of recently proposed transmission lines affirm that a major change in the State's transmission planning needs to be made to facilitate joint use and planning of transmission projects by IOU's and POU's. To some extent RETI has facilitated that process by listing all of the segments in a single databank.

Farm Bureau will continue to follow the process and the results produced by RETI. As projects continue to be proposed in response to the mandate to meet a 33% RPS by 2020, our members have already experienced the affects the projects will have on agricultural resources.

Very truly yours,

A handwritten signature in black ink, appearing to read "Karen Norene Mills". The signature is fluid and cursive, with the first name "Karen" being the most prominent.

KAREN NORENE MILLS